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OF NEW JERSEY AS A CIVIL TRIAL ATTORNEY)

February 15, 2013

**VIA ELECTRONIC FILING**

Honorable Magistrate Mark Falk, U.S. Magistrate  
United States District Court, District of New Jersey  
Frank R. Lautenberg  
US PO & Courthouse Bldg. Room 457  
1 Federal Square  
Newark, New Jersey 07102

RE: Hartford Ins. Co. of the Midwest v. Meecorp Capital Markets, LLC  
Case No. 2:10-CV-06441-DMC-JAD  
Our File No. 26242

Dear Magistrate Falk:

This office represents the defendant, Meecorp Capital Markets, LLC. in the above referenced matter. I am writing with the consent of counsel for plaintiff, Hartford Insurance Company of the Midwest, to request an at least one week adjournment of the March 13, 2013 settlement conference in this matter. Additionally, if that request is granted, we would also request an adjournment of the April 1, 2013 pre-trial conference to provide more time for the parties to prepare for same.

As Your Honor is aware, this suit involves an insurance coverage dispute, as to whether Hartford is obligated to provide Meecorp insurance coverage and a defense in a Missouri-class action TCPA suit. A mediation has just been scheduled in the Missouri suit for March 18, 2013. At the mediation representatives of the plaintiff in the Missouri suit, Meecorp and Hartford, will all be present. The mediation will provide an opportunity for a global settlement of both the underlying Missouri suit and this action. The mediation in the underlying suit provides the best opportunity for resolution of this suit as well as the underlying suit.

SCHIFFMAN, ABRAHAM, KAUFMAN & RITTER, P.C.

Honorable Magistrate Mark Falk, U.S. Magistrate

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On the other hand, the settlement conference for March 13, 2013 will not involve counsel for plaintiff in the underlying suit. The decision of plaintiff in the underlying suit as to how much they are willing to settle, is an essential element to any settlement between Meecorp and Hartford. It could be extremely difficult if not impossible, for Meecorp and Hartford to reach a settlement on the 13<sup>th</sup> without knowing what the underlying suit was going to settle for.

For the above reasons, we are requesting that the March 13, 2013 settlement conference be adjourned for at least one week until after completion of the March 18<sup>th</sup> mediation in the Missouri action. And, if necessary, an adjournment of the April 1, 2013 Pretrial Conference.

Thank you for your consideration of our request.

Respectfully submitted,

SCHIFFMAN, ABRAHAM,  
KAUFMAN, & RITTER, PC

s/Daniel S. Eichhorn  
Daniel S. Eichhorn

DSE:ig

cc: Gerald D. Wixted, Esq. (via electronic filing)  
Meecorp Capital Markets, LLC